



JOHN PIERCE LAW

John M. Pierce – Managing Partner
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April 13, 2023

Defendants' application on consent, ECF No. 55, is
GRANTED. The deadline to complete fact discovery is
extended to June 26, 2023.

VIA ECF

SO ORDERED.

Hon. Jennifer H. Reardon
United States District Judge
Southern District of New York
500 Pearl Street, Room 1010
New York, New York 10007

Jennifer H. Reardon, U.S.D.J.
Date: April 14, 2023

Re: *Steven Rosati v. Long Island Rail Road Co., et al.*, No. 21-CV-08594)

Dear Judge Reardon,

I represent Plaintiff, Steven Rosati in this matter. I am writing to let the Court know that we agree to Defendants' update. I apologize for the delay in response time, the attorney at our firm that was assigned to this matter came down with a bad case of pneumonia.

In accordance with the Defendants' request for additional time, we are also in agreement with the extension of time and respectfully request that the Court allow the parties this additional time of 90 days to complete discovery.

Therefore, Plaintiff's position on Defendants' application is in agreement with the above-mentioned status update.

Sincerely,

John M. Pierce

Managing Partner
John Pierce Law P.C.

cc: **VIA ECF**
All Counsel of Record

Re: Litigation Hold Letter and Cease and Desist

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